

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

2016 OCT 20 PM 4:59

CLERK

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DEPUTY CLERK

Criminal No. 1:16-CR-121

UNITED STATES OF AMERICA)
)
v.)
)
EVAN HARRIS, aka "Red," aka "Redd,")
WILLIAM EDWARD HARRIS, aka "Gee,")
SARA MUNGER, aka "Big Sara,")
SARAH LAROCK,)
[REDACTED])
JEFFREY LACROIX,)
[REDACTED], and)
JENNIFER PATCH,)
Defendants.)

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2016 OCT 25 PM 2:59

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SUPERSEDING INDICTMENT

Count 1

The Grand Jury charges that:

Between in or about February of 2015 and on or about August 25, 2016, in the District of Vermont and elsewhere, the defendants, EVAN HARRIS, aka "Red," aka "Redd;" WILLIAM EDWARD HARRIS, aka, "Gee;" SARA MUNGER, aka "Big Sara;" SARAH LAROCK; [REDACTED] " JEFFREY LACROIX; [REDACTED]; and others, known and unknown to the Grand Jury, knowingly and willfully conspired to distribute heroin, a Schedule I controlled substance, and cocaine base and fentanyl, Schedule II controlled substances.

With respect to defendants EVAN HARRIS, aka "Red," aka "Redd," and SARA MUNGER, aka "Big Sara," their conduct as members of the conspiracy, including the reasonably foreseeable conduct of other members of the conspiracy, involved 28 grams or more of a mixture and substance containing a detectable amount of cocaine base and 100 grams or more of a mixture and substance containing a detectable amount of heroin.

With respect to defendant WILLIAM EDWARD HARRIS, aka, "Gee," his conduct as a member of the conspiracy, including the reasonably foreseeable conduct of other members of the conspiracy, involved 100 grams or more of a mixture and substance containing a detectable amount of heroin.

(21 U.S.C. §§ 841(a), 841(b)(1)(B), 841(b)(1)(C), 846)

Count 2

The Grand Jury further charges that:

On or about February 18, 2015, in the District of Vermont, the defendant, SARAH LAROCK, knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(C); 18 U.S.C. § 2)

Count 3

The Grand Jury further charges that:

On or about March 1, 2015, in the District of Vermont, the defendant, EVAN HARRIS, aka "Red," aka "Redd," knowingly and intentionally possessed with intent to distribute heroin, a Schedule I controlled substance, and 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(B), 841(b)(1)(C); 18 U.S.C. § 2)

Count 4

The Grand Jury further charges that:

On or about October 26, 2015, in the District of Vermont, the defendant, SARAH LAROCK, knowingly and intentionally distributed heroin, a Schedule I controlled substance, and cocaine base, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(C); 18 U.S.C. § 2)

Count 5

The Grand Jury further charges that:

On or about October 28, 2015, in the District of Vermont, the defendant, SARAH LAROCK, knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(C); 18 U.S.C. § 2)

Count 6

The Grand Jury further charges that:

Between in or about October of 2015 and in or about April of 2016, in the District of Vermont, the defendant, JEFFREY LACROIX, unlawfully and knowingly managed and controlled 6 Merrill Lane, Unit #204, Milton, Vermont, as an occupant and knowingly and intentionally made available for use this apartment for the purpose of unlawfully distributing heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

(21 U.S.C. § 856(a)(2))

Count 7

The Grand Jury further charges that:

On or about April 20, 2016, in the District of Vermont, the defendant, EVAN HARRIS, aka "Red," aka "Redd," knowingly and intentionally distributed fentanyl, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(C))

Count 8

The Grand Jury further charges that:

On or about May 3, 2016, in the District of Vermont, the defendant, EVAN HARRIS, aka “Red,” aka “Redd,” knowingly and intentionally distributed fentanyl, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(C))

Count 9

The Grand Jury further charges that:

On or about May 9, 2016, in the District of Vermont, the defendant, EVAN HARRIS, aka “Red,” aka “Redd,” knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(C))

Count 10

The Grand Jury further charges that:

In or about [REDACTED], in the District of Vermont, the defendant, [REDACTED]
[REDACTED] unlawfully and knowingly managed and controlled [REDACTED]
[REDACTED] as an occupant and knowingly and intentionally made available for
use this apartment for the purpose of unlawfully distributing heroin, a Schedule I controlled
substance.

(21 U.S.C. § 856(a)(2))

Count 11

The Grand Jury further charges that:

On or about June 27, 2016, in the District of Vermont, the defendants, EVAN HARRS, aka “Red,” aka “Redd,” and WILLIAM EDWARD HARRIS, aka, “Gee,” knowingly and intentionally possessed with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(B), 841(b)(1)(C); 18 U.S.C. § 2)

Count 12

The Grand Jury further charges that:

On or about July 7, 2016, in the District of Vermont, the defendant, SARA MUNGER, knowingly and intentionally possessed with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and cocaine base, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(B), 841(b)(1)(C); 18 U.S.C. § 2)

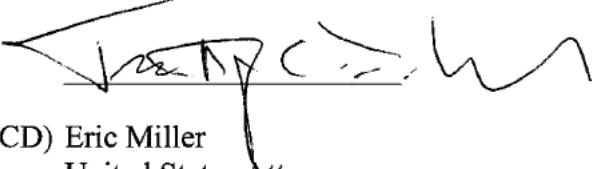
Count 13

The Grand Jury further charges that:

On or about August 25, 2016, in the District of Vermont, the defendant, JENNIFER PATCH, knowingly and intentionally possessed with intent to distribute heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(C); 18 U.S.C. § 2)

A TRUE BILL
[REDACTED]
FOREPERSON


(TCD) Eric Miller
United States Attorney
Burlington, Vermont
October 20, 2016